REMARKS

The above amendments to the claims along with the following remarks are being submitted as a full and complete response to the Official Action dated February 18, 2005. In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

Status of the Claims

Claims 1-22 are under consideration in this application. Claim 1 is being amended, as set forth in the above marked-up presentation of the claim amendments, in order to more particularly define and distinctly claim applicants' invention.

The claims are being amended to correct formal errors and/or to better disclose or describe the features of the present invention as claimed. All the amendments to the claims are supported by the specification. Applicants hereby submit that no new matter is being introduced into the application through the submission of this response.

Prior Art Rejection

Claims 1-16 and 21-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 6,293,802 to Ahlgren. (hereinafter "Ahlgren") in view of U.S. Pat. No. 6,705,942 to Crook et al. (hereinafter "Crook"), and claims 17-19 were rejected as being unpatentable over Ahlgren, in view of Crook, and further in view of U.S. Pat. No. 5,857,855 to Katayama (hereinafter "Katayama"). These rejections have been carefully considered, but are most respectfully traversed, as more fully discussed below.

A body movement training method of the present invention, as now recited in claim 1 (e.g., Figs. 1-2), comprises: storing images of at least one trainer in a server; providing a public mobile communication network 2 ("such as a PDC/PHS" p. 7. line 8; also derived from the operation network of a cellular phone shown in Fig. 2) and internet 4 to support image communication between a trainee and the server; taking at least one image of the trainee at a training or sport site 5; searching the server for at least one of the images of said trainer with a *corresponding movement* to said image of the trainee (page 12, line 7) based upon a request of

the trainee sent from a ***portable mobile phone communication terminal*** 1 via the public mobile communication network 2 and then the internet 4 to the server (p. 10, 2nd paragraph); sending said searched image of the trainer from the server to the portable mobile phone communication terminal 1 via the internet 4 and then the public mobile communication network 2; displaying side by side said searched image of said trainer and said image of the trainee on the ***portable mobile phone communication terminal*** 1.

Applicant respectfully submits that none of the cited prior art references discloses, teaches or suggests "searching the server for at least one of the images of said trainer with a *corresponding movement* to said image of the trainee (page 12, line 7) based upon a request of the trainee sent from a *portable mobile phone communication terminal* 1 via the public mobile communication network 2 and then the internet 4 to the server", "sending said searched image of the trainer from the server to the portable mobile phone communication terminal 1 via the internet 4 and then the public mobile communication network 2" and "displaying side by side said searched image of said trainer and said image of the trainee on the *portable mobile phone communication terminal*" as recited in claim 1 according to the invention.

As admitted by the Examiner on page 3, lines 8-9 of the outstanding Office Action, Ahlgren does not disclose that a user may request image data from a portable device. Crook's system for providing golf instructions over a network to a hand-held apparatus 910a were relied upon by the Examiner to teach a mobile communication system (Fig. 9). Although Ahlgren and Crook use public network systems as asserted by the Examiner (p. 5, lines 14-18 of the outstanding Office Action), they do not transfer the image signals via any public mobile communication network as now recited in claim 1. There are clear distinctions between a public network referenced by the Examiner and a public mobile communication network of the invention.

Ahlgren's communication paths of Internet, or wireless communications, or direct phone lines, are provided between the capture station 104 and analysis center 108 (col. 5, lines 35-45). As Ahlgren does not involve any portable mobile phone communication terminal, it does not "send a request of the trainee from a *portable mobile phone communication terminal* 1 via the public mobile communication network 2 and then the internet 4 to the server", or "send any searched image of the trainer from the server to *the portable mobile phone communication*

terminal 1 via the internet 4 and then the public mobile communication network 2" as the invention.

As to Crook, it merely sends data via the internet and a private radio communication network, but not any public mobile communication network. The impulse radio technology applied by Crook is also named as UWB - *or Ultra Wideband* - a technology that did not have a universal/public standard as of the filing date of the application on May 2, 2001, and as of now. Crook's handheld radio communication apparatus 910a does not transmit and receive signals via a public mobile communication network system like a mobile phone.

In addition, the impulse radio technology uses extremely short pulses (.1 to 1.5 Nanoseconds) and very low average power in the milliwatt range such that Crook's radio transmission is limited to a line of sight or a geographic scope, rather than reaching anywhere covered by a satellite or a base station of the public mobile communication network.

There are clear distinctions between Crook's handheld impulse radio apparatus 910a and a mobile phone communication terminal according to the invention as of May 2, 2001, the filing date of the application. The mobile phone of the invention allows communication with any terminal in a public mobile network system. A golfer can purchase any portable mobile phone communication terminal from any stores rather than a specific golf shop. Moreover, such a portable mobile phone communication terminal can be used in any places, rather than just in golf courses. Even more, such a portable mobile phone communication terminal can be used in any golf course, rather than just one specific golf course. On the contrary, Crook's handheld apparatus 910a was owned and programmed by a particular golf course so as to (1) "*track assets such as carts, mowers, employees or golfers* (col. 15, lines 50)" ; and (2) "*to drive revenue into the golf trainer's department* (col. 15, line 65)"

Applicants respectfully contend that one skilled in the art would not be motivated to replace Crook's handheld radio communication apparatus 910a (which communicates via a private radio communication network) with a portable mobile phone communication terminal (which communicates via a public mobile communication network), since it would defeat Crook's main intended purpose of "*non-intrusive tracking and data collection device that can provide benefits to three primary groups of users which include golf course personnel, golf trainers and golfers. The golf course personnel can utilize the handheld apparatus 910a to track*

assets such as carts, mowers, employees or golfers (col. 15, lines 45-50)," which contained commercial operation secrets and should not be accessible by the public or competing golf courses via any public mobile communication network. Besides, the public mobile communication carriers only offer tracking services to the police, firefighting agencies for emergency rescue, but not to any commercial entities or individuals for business or personal purposes. As such, Crook could not use portable mobile phone communication terminals communicating via a public mobile communication network of the invention to track assets, employees, and players.

Even if, arguendo, a person of ordinary skill were motivated to combine the teachings in Ahlgren and Crook as alleged by the Examiner, such combined teachings would still fall short in fully meeting the Applicants' claimed invention as set forth in claim 1. Ahlgren, at most, uses a cell phone link to communicate between the capture station 104 and analysis center 108, but not between any cell phone and a server, to transfer golf training images. First of all, Ahlgren's cell phone link and Crook's radio communication apparatus 910a are not compatible due to their different communication protocols. Secondly, neither Ahlgren nor Crook disclose transmitting golf training images to a portable mobile phone communication terminal via a public mobile communication network.

Applicants contend that Ahlgren, Crook, or their combination fails to teach or disclose each and every feature of the present invention as disclosed in independent claim 1. As such, the present invention as now claimed is distinguishable and thereby allowable over the rejections raised in the Office Action. The withdrawal of the outstanding prior art rejections is in order, and is respectfully solicited.

Conclusion

In view of all the above, clear and distinct differences as discussed exist between the present invention as now claimed and the prior art reference upon which the rejections in the Office Action rely, Applicant respectfully contends that the prior art references cannot anticipate the present invention or render the present invention obvious. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicant's undersigned representative at the address and telephone number indicated below.

Respectfully submitted,

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